Gilbert A. Samberg (GS-2610) Kevin N. Ainsworth (KA-8493) MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO, P.C. Chrysler Center 666 Third Avenue New York, New York 10017 (212) 935-3000 (212) 983-3115 (facsimile)

Attorneys for Respondents-Cross-Petitioners

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Application of

RAMY LAKAH and MICHEL LAKAH,

Petitioners-Cross-Respondents,

For a judgment pursuant to Article 75 of the C.P.L.R. staying the arbitration commenced by

UBS AG, EXPORTERS INSURANCE COMPANY, LTD., ARAB BANKING CORPORATION, NATIONAL BANK OF ABU DHABI and NATIONAL BANK OF OMAN,

Respondents-Cross-Petitioners.

TO: Lester Schwab Katz & Dwyer, LLP

120 Broadway

New York, NY 10271

Attn: Lawrence Steckman, Esq. Dennis M. Rothman, Esq.

Counsel for Petitioners

07-CIV-2799 (MGC)(FM)

NOTICE OF MOTION FOR ISSUANCE OF SUBPOENA TO CARL BAKER PURSUANT TO 28 U.S.C. §1783

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of the Motion of Respondents-Cross-Petitioners for an Order Directing the Issuance of a Subpoena to Carl Baker Pursuant to 28 U.S.C. §1783, the consent by Petitioners to this

motion, the Declaration Gilbert A. Samberg, dated April 16, 2007, together with the exhibits annexed thereto, the Declaration Gilbert A. Samberg, dated July 9, 2007, and all pleadings and proceedings previously had herein, the undersigned will move the U.S. District Court in the United States Court House, 500 Pearl Street, New York, New York, 10007, on July ___, 2007, at 9:30 a.m. for an order to issue a subpoena requiring Carl Baker ("Baker") to appear as a witness before a Court Reporter at the offices of Jeantet Associés, 87 Avenue Kléber, Paris (Cedex 16), France (or at another mutually convenient place), and requiring Mr. Baker to produce specified documents and things. (Attached hereto is a proposed Order.)

PLEASE TAKE FURTHER NOTICE that pursuant to S.D.N.Y. Local Rule 6.1(b), answering papers, if any, shall be served within 10 business days after service of the papers herein, and reply papers, if any, shall be served within 5 business days after service of answering papers, if any.

Dated:

July 9, 2007

New York, New York

MINTZ LEVIN COHN FERRIS GLOVSKY

and POPEO, PG

By:-

Gilbert A. Samberg (GS-2610)

Kevin N. Ainsworth (KA-8493

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